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BY ECF

March 15, 2022

Hon. Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

MEMO ENDORSED

Re: *USA v. Wilson* (Agram Taj), (S3) 21 Cr. 249 (SHS)

Dear Judge Stein:

I am appointed counsel for Mr. Argam Taj. There is an in-person hearing scheduled for March 30, 2022. I have been out of my office in Tampa for the past week as my sister went into hospice. A Wyoming court graciously permitted an adjournment of a live witness hearing that was scheduled for Thursday March 10, 2022 when I was with my sister (the day my sister actually passed that evening). The Wyoming court reset the hearing for March 31, 2022 in Cheyenne as it was the only day the Wyoming court had a complete half day for the hearing. It is a live witness hearing and there are multiple attorneys. It involves a preliminary injunction and is time sensitive.

I would like to be able to fly on the 29th to Wyoming and prepare my witnesses on the 30th for the 31st hearing. Since the preliminary injunction hearing is on the 31st it will be very difficult to appear in person in New York City for the status conference on the 30th since the SDNY hearing is at 2:30 p.m. The motions schedule in this case has been continued to April 15, 2022.

The government, by AUSA Ashley Nicholas has consented to this request. (Should the Court determine to reset the hearing for after the motions are filed, Counsel advises that she is unavailable April 7th, April 13th through April 30th; May 16th through the 19th; and May 28th through June 24th.)

Respectfully,

/s/ Inga L. Parsons

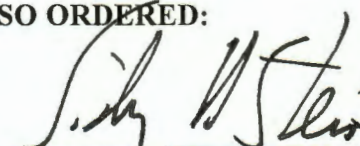
Inga L. Parsons

Cc: ECF filing all counsel of record

At Ms. Parsons' request, she may appear by telephone at the conference on March 30 at 2:30 p.m. The call-in number is 888-273-3658, access code 7004275.

Dated: New York, New York
March 15, 2022

SO ORDERED:


Sidney H. Stein, U.S.D.J.